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9
**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

10 Laura Leigh, individually, and Wild Horse
 Education, a Non-Profit Corporation

11 Case No. 3:25-cv-00039-ART-CSD

12 Plaintiff,

13
PROPOSED SCHEDULING ORDER

14 v.
 15 Interior Board of Land Appeals, United
 States Department of Interior, Bureau of
 Land Management, and KG Mining, Inc.,

16 Defendants.

17 Under the Administrative Procedure Act, 5 U.S.C. § 701 *et seq.*, Fed. R. Civ. P. 16,
 18 and LR 16-1(c)(1), Plaintiffs Laura Leigh and Wild Horse Education (WHE), Defendants
 19 Interior Board of Land Appeals (“Board”), the U.S. Department of the Interior
 20 (“Department”), and the Bureau of Land Management (“BLM”) (collectively, “Federal
 21 Defendants”), and Defendant KG Mining (Bald Mountain) Inc. (KG Mining), (collectively
 22 “the Parties”), submit this proposed schedule for briefing and the lodging of an
 23 administrative record (AR) rather than discovery. The Parties contend that no discovery
 24 deadlines or under Fed R. Civ. P. 26 and LR 26-1 are applicable. *See* paragraph 6 of
 25 concurrently filed case management report. Pursuant to this Court’s Order, ECF No. 28 at
 26 2, undersigned counsel, lead counsel for Federal Defendants, lead counsel for Plaintiffs,
 27 and lead counsel for Defendant KG Mining conferred telephonically on April 15, 2025,
 28 and have agreed to the following:

1 **AR:**

2 **June 30, 2025:** Federal Defendants will file and serve the AR.¹

3 **July 14, 2025:** Plaintiffs and KG Mining shall notify Federal Defendants of any concerns
4 with the AR including whether and why they believe that the filed AR is not an accurate
5 and complete copy of the administrative record for this matter, and/or the grounds and
6 details for any proposed supplementation of the AR.

7 **July 25, 2025:** The Parties shall confer about any issues raised as to the AR and they will
8 attempt to resolve such issues.

9 **August 8, 2025:** If there remain any unresolved issues about the AR, Plaintiffs and/or KG
10 Mining will file a motion to complete or supplement the AR.²

11 If any party files a motion related to the AR, then the merits briefing schedule below
12 will be vacated. Within 14 days of the Court's decision on any motion related to the AR, the
13 parties will submit a revised merits briefing schedule.

14 If the parties do not file a motion related to the AR, then the parties shall proceed with the
15 merits briefing schedule below.

16 **Merits Briefs via Cross-Motions for Summary Judgment**

17 **August 29, 2025:** Plaintiffs will file their motion for summary judgment, which can be up
18 to 40 pages, excluding tables and exhibits.

19 **October 10, 2025:** Federal Defendants and Defendant KG Mining will each file a
20 combined opposition/motion for summary judgment, respectively, which can be up to 40
21 pages excluding tables and exhibits.

22 **November 7, 2025:** Plaintiffs will file either one combined opposition/reply in response to
23 both Defendants' openings briefs, which can be up to 30 pages, excluding tables and
24 exhibits, or, in the alternative, Plaintiffs will file two combined oppositions/replies in

25 ¹ Federal Defendant will file through the CM/ECF system a notice of lodging the AR with the Clerk of Court. Federal
26 Defendants will lodge with the Clerk of Court the AR on a USB flash drive, as well provide a courtesy copy USB
27 flash drive to Judge Traum's chambers, per her Chambers Practices, and send Plaintiffs' counsel and counsel for KG
Mining the AR on a USB flash drive.

28 ² Any such motion can seek consideration only of documents that Plaintiffs or KG Mining identified to Federal
Defendants during the AR conferral process set forth above.

1 response to each Defendant's opening brief, which can be up to 20 pages, excluding tables
 2 and exhibits.

3 **December 5, 2025:** Federal Defendants and Defendant KG Mining will each file a reply,
 4 respectively, which can be up to 20 pages, excluding tables and exhibits.

5 Accordingly, the Parties respectfully submit that the schedule and page limitations
 6 requested herein will conserve judicial resources better than the standard briefing schedule
 7 and page limits authorized by Local Rules 7-3(a) and 7-2(b).

8 Respectfully submitted this 30th day of April 2025.

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22 *Attorneys for Plaintiff*

23 **IT IS SO ORDERED:**

24

UNITED STATES DISTRICT JUDGE
 25 **UNITED STATES MAGISTRATE JUDGE**

26 **DATED:** _____
